

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10900002-2006**

Plant Identification Number: **03-54-109-00002**

Permittee: **Herndon Processing Company, LLC**

Facility Name: **Keystone #2 Preparation Plant**

Mailing Address: **Post Office Box 399, Bud, West Virginia 24716**

Physical Location:

Herndon, Wyoming County, West Virginia

UTM Coordinates:

467.79 km Easting • 4152.26 km Northing • Zone 17

Directions:

From I77 South at Beckley take the Robert C. Byrd Drive Exit to WV Route 16. Follow WV Route 16 to WV Route 54. Turn onto WV Route 54 towards Mullens, WV. Then turn back onto WV Route 16 from WV Route 54. From WV Route 16 turn onto WV Route 10 toward Herndon, WV. Plant is located on the right side of WV Route 10 before reaching Herndon.

Facility Description

Herndon Processing Company, LLC, Keystone Number 2 Preparation Plant (SIC 1221) operates a 500 tons per hour coal preparation plant. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2004 Actual Emissions
Carbon Monoxide (CO)	71.70	21.17
Nitrogen Oxides (NO _x)	214.62	13.67
Particulate Matter (PM ₁₀)	125.02	16.80
Total Particulate Matter (TSP)	250.04	33.59
Sulfur Dioxide (SO ₂)	197.76	27.51
Volatile Organic Compounds (VOC)	153.30	9.31
Lead (Pb)	0.07	0.05
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2004 Actual Emissions
Total HAPs	1.09	<1.0
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

Title V Program Applicability Basis

This facility has the potential to emit 214.62 tons per year of NO_x, 125.02 tons per year of PM₁₀, 197.76 tons per year of SO₂ and 153.30 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, and over 25 tons per year of aggregate HAPs, Herndon Processing Company, LLC, Keystone Number 2 Preparation Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR5	Control of particulate matter from coal preparation plants
	45CSR6	Open burning prohibited.
	45CSR10	Prevent and Control air pollution from the emission of sulfur oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR16	New Source Performance Standards
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60 Subpart Y	Standards of Performance for Coal Preparation Plants

	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R30-10900002-1996	May 30, 2001	Permit Determination 97-007; Issued June 16, 1997; Throughput limits BC-11 and BC12.

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The only change to the May 30, 2001 Fact Sheet was an Administrative Amendment in 2003 for a name change.

40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)

This facility does have a pollutant specific emissions unit with a control device to meet an applicable standard or limit. Thus, the CAM rule, 40 C.F.R. Part 64, applies to this facility which is required to obtain a Title V permit and satisfy the following criteria:

1. The emissions unit is subject to an emissions limitation or standard with exceptions noted in 40 C.F.R. § 64.2(b)(1);
2. The emissions unit uses a control device to achieve compliance with the emissions limitations or standards; and,
3. The unit has a potential to emit emissions of the applicable regulated pollutant that are equal to or greater than 100% of the amount, in tons per year, required to be classified a major source.

WVDAQ believes that the monitoring and record keeping procedure presented by the permittee will be adequate in controlling particulate matter and sulfur dioxide from the thermal dryer. This plan meets the requirements of the CAM rule.

The control units subject to CAM at this facility are the multiclone system and wet scrubber collection devices.

A. Multiclone System

The Multiclone System (MCS) is subject to CAM for the following criteria:

1. The multiclone system is a precleaner used to reduce the large particle size grain loading before entry into the wet scrubber. The maximum allowable particulate loading for the thermal dryer shall not exceed 0.12 grains per cubic foot. The MCS has an control efficiency of 40% for reducing particulate matter.
2. The MCS is used to control particulate matter and opacity.
3. Before controls, the particulate matter emissions rate is above the major source level of 100 tons per year.

The indicators selected are the opacity monitoring, pressure drop ranges, and inlet temperature to the control device as well as maintaining maintenance records of the control device. These selected based on the operating practice of the control equipment operation and the April 4, 2002 stack test. The temperature and pressure drops indicators are manually monitored and recorded over a 12-hour period or once per shift.

B. Wet Scrubber Collection Device

The wet scrubber collection device (WSCD) is subject to CAM for the following criteria:

1. The WSCD uses the impaction energy and captures ability of water particles in order to remove particulate matter from the gas stream. The scrubber design is an Impinjet wet scrubber.
2. The scrubber has capture efficiency of 100% and control efficiency of 99.25% for particulate matter and 70% for sulfur dioxide.
3. Before controls the potential emissions for particulate matter and sulfur dioxide each exceeded 100 tons per year.

The indicators selected are the opacity monitoring, water pressure to the control equipment, pressure loss of the inlet airflow to the scrubber, and pressure drop ranges across the scrubber. These selected based on the operating practice of the control equipment operation and the April 4, 2002 stack test. These indicators are manually monitored and recorded over a 12-hour period or once per shift.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

No additional changes from the May 30, 2001 Title V Fact Sheet.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: February 8, 2006
Ending Date: March 10, 2006

All written comments should be addressed to the following individual and office:

Wayne Green
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. (1258) • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.